

REMARKS

The Office Action dated September 23, 2003 has been reviewed and carefully considered. Claim 24 has been added. Claims 1-24 are pending, of which the independent claims are 1, 6, 15 and 18. No claims have been amended. Reconsideration of the above-identified application, as amended and in view of the following remarks, is respectfully requested.

Claims 1-23 stand rejected under 35 U.S.C. 103(a) as unpatentable over Humpleman (International Publication No. WO99/57837) in view of U.S. Patent No. 6,519,597 to Cheng et al. ("Cheng").

Claim 1 recites "A method of operating an intelligent digital device (IDD) receiving an eXtensible Markup Language (XML) document containing data and respective Document Type Definition (DTD) describing the data content, comprising:

verifying that a received DTD satisfies a predetermined criteria; and,
if said criteria is satisfied, operating on said data based on said content."

Item 8 of the Office Action concedes that Humpleman does not disclose satisfying "a predetermined criteria" and further fails to disclose operating on the data "if said criteria is satisfied."

Cheng uses the reference table XML_DTD_REF to build a database (col. 8, lines 21-22: "initially, the DB2TM database must be XML enabled to work with an XML extender"), whereas Humpleman uses XML operationally in device-to-device control (page 17, lines 11-21). Accordingly, even if Humpleman were furnished with a Cheng database, there is no apparent motivation to modify the device-to-device operation of Humpleman based on Cheng pre-operational set-up procedures.

Moreover, although Cheng discloses referencing the table XML_DTD_REF as a “DTD repository” (col. 11, line 61), the referencing is performed merely to retrieve “information about DTDs” (col. 11, line 59) and **not in connection with any filtering that determines whether to operate “on said data based on said content.”**

Accordingly, it is unclear how Humpleman is revised in view of Cheng to incorporate the feature of “if said criteria is satisfied, operating on said data based on said content,” as explicitly required by the language of claim 1, much less what motivation would have existed to make the revision.

For at least these reasons, the proposed combination of references fails to feature the limitation that “if said criteria is satisfied, operating on said data based on said content.” Accordingly, Humpleman/Cheng fails to render obvious the invention as recited in claim 1. Reconsideration and withdrawal of the rejection is respectfully requested.

As to claim 6, it similarly recites “when the respective DTD for the generated XML document satisfies a predetermined criteria, operating on said data contained in the XML document at the second IDD based on said content. Claim 6 is therefore deemed to be patentable over the cited references for at least the same reasons. Reconsideration and withdrawal of the rejection is respectfully requested.

Regarding claim 15, it recites “(c) when the respective DTD satisfies a predetermined criteria, parsing the data in the XML document in accordance with the format described in the respective DTD to thereby generate parsed data from the related data; and (d) operating on the parsed data.”

On page 10, again the Office Action concedes the Humpleman does not

disclose satisfying a “predetermined criteria.” The Office Action reiterates that Cheng discloses satisfying a “predetermined criteria” and relies again on the same text passages discussed above in connection with the reference table XML_DTD_REF. The Office Action also states that Humpleman discloses parsing XML to validate it (page 30, line 16: “parsing and validating”).

However, the Humpleman “parsing and validating” is performed for operational “device-to-device” control (page 29, lines 26-29), whereas the Cheng text passages relate to deciding whether to update a table used by an extender in pre-operational building of a relational database. Accordingly, as set forth above, there is no disclosure or suggestion of “when the respective DTD satisfies a predetermined criteria, parsing the data in the XML document in accordance with the format described in the respective DTD to thereby generate parsed data from the related data.”

For at least this reason, the proposed combination fails to render obvious the invention as recited in claim 15. Reconsideration and withdrawal of the rejection is respectfully requested.

Claim 18, comprises five steps, and page 14 of the Office Action concedes that Humpleman fails to disclose steps 2, 3, 4 and 5. In particular, therefore, Humpleman fails to disclose:

“a second IDD stores N XML processors associated with N named DTDs;
a third IDD stores M XML processors associated with M named DTDs;
the second IDD processes the XML document using one of the N XML processors when the respective DTD corresponds to one of the N named DTDs;
the third IDD processes the XML document using one of the M XML processors when the respective DTD corresponds to one of the M named DTDs.”

The Office Action apparently attempts to apply Cheng pre-operational database building techniques to Humpleman operational device-to-device control to somehow synthesize an embodiment wherein, for example, “the third IDD processes . . . when the respective DTD corresponds to one of the M named DTDs.

Once again, however, there is no apparent motivation for modifying Humpleman operational device-to-device XML document transmittal using Cheng pre-operational database building methods. Accordingly, for at least the reasons set forth above, the proposed combination of references fails to render obvious the invention as recited in claim 18. Reconsideration and withdrawal of the rejection is respectfully requested.

The remaining rejected claims each depend from one of the independent claims, and are deemed patentable for at least the same reasons.

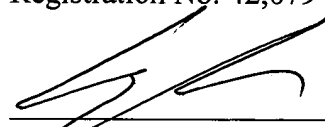
New claim 13 has been added to further point out aspects of the invention, and finds support in the specification (e.g., page 13, lines 1-9).

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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Date: 11/5/03

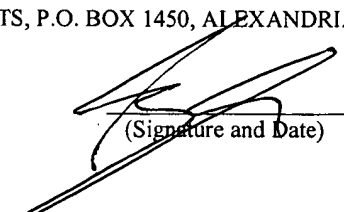

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